



South Coast Air Quality Management District

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FAXED: APRIL 21, 2005

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Mr. Dan Bott
Department of Planning
City of Santa Ana
P. O. Box 1988
Santa Ana, CA 90262

Dear Mr. Bott:

**Draft Environmental Impact Report (DEIR) for
MacArthur Place South: Santa Ana, March 2005**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for allowing additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB

ORCO50308-04
Control Number

**Draft Environmental Impact Report (DEIR) for
MacArthur Place South: Santa Ana, March 2005**

1. **URBEMIS 2002 Project Analysis:** Although the lead agency uses the URBEMIS 2002 model, a model approved for this use by the SCAQMD, the model printout presented in Appendix A shows construction years (2003 and 2004). According to construction schedule on page 57 of the DEIR, construction starts in 2005 and lasts for a 27-month period. As recommended in the following comments, the URBEMIS 2002 model should be run again for the proposed project using the correct construction years.
2. **Demolition Emissions:** The discussion of demolition only includes fugitive dust emissions. Review of the URBEMIS printout shows that the demolition phase was turned off. There is no quantification of onsite construction equipment emissions or on-road, heavy-duty haul trucks emissions from hauling away demolition debris. The model needs to be rerun to calculate emissions from on-road and off-road equipment.
3. **Construction (Finish Work) Emissions:** Construction emissions appear to be underestimated for the following reasons. Review of the URBEMIS 2002 output file shows no emissions for onsite construction equipment. However, on page 57, fifth paragraph, the lead agency identifies the following construction equipment needed for the proposed project: trucks, graders, bulldozers, concrete mixers, and three cranes. The model needs to be rerun to include the above described equipment.
4. **Dump and Spread PM10 Emission Factor:** The table on page 156 of the DEIR shows PM10 emission factors for site excavation, soil loading, dumping and spreading. The correct emission factor for soil dumping and spreading is 0.009075 pounds per ton and not 0.09075 pounds per ton. See Table A9-9 in Appendix 9 in SCAQMD 1993 CEQA Air Quality Handbook.
5. **CO Hot Spots Analysis:** The lead agency presents the project CO impacts in Table 14 in Volume 1 and Table 5 in Appendix A. The lead agency did not provide the input data needed to review and verify the results presented in the two tables although SCAQMD staff requested the data in the Air Quality Appendix. Furthermore, the lead agency shows only the 1-hour CO concentrations in the two tables but fails to address the 8-hour average concentrations. Please provide this information along with the input data in the Final EIR to facilitate review. For future reference, please provide the SCAQMD all files related to the air quality analysis including input and output files.

6. **Mitigation Measures:** The lead agency proposes, on page 163 of the DEIR, using gasoline-powered equipment for on-site and off-site construction activities. To further reduce construction emissions, it is recommended that instead of gasoline-powered construction equipment, the lead agency consider requiring the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts. Alternatively, if diesel equipment has to be used, project contractors should use particulate filters or low sulfur diesel, as defined in AQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content. To further reduce project emissions, SCAQMD staff recommends the following mitigation measures to the lead agency for consideration:

- Use electricity from power poles instead of temporary diesel- or gasoline-powered generators.
- Add to mitigation measure AQ-2 the following: Post a publicly visible sign with name of the construction relations officer and telephone number for dust complaints.
- Use low-polluting, high energy-efficient appliances.
- Install solar panels on roofs to supply electricity for heating and cooling.
- Use double-paned windows to reduce thermal loss.
- Install automatic lighting on/off controls and energy-efficient lighting.
- Use light-colored roofing materials in new construction to deflect heat away from buildings.